



U.S. Department of Justice

United States Attorney Southern District of New York

United States District Courthouse 300 Quarropas Street White Plains, New York 10601

March 19, 2021

The Honorable Cathy Seibel
United States District Court
Southern District of New York
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, New York 10601-4150

Re: United States v. Erin Verespy, S1 21 Cr. 24 (CS)

Dear Judge Seibel:

The Government respectfully writes regarding the schedule in the above-titled case. On March 11, 2021, Erin Verespy appeared before Judge Krause, waived indictment, and was arraigned on a one-count superseding felony information. S1 21 Cr. 24 (CS) (ECF No. 86). The parties have reached an expected resolution of this matter pursuant to a plea agreement. Based on discussions with chambers, the parties understand that the Court is available for a change-of-plea hearing on March 31, 2021 at 11:45 a.m.

The Government respectfully requests, with the consent of defense counsel, that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), from March 25, 2021 through and including March 31, 2021. Judge Krause previously excluded time in this matter from March 11, 2021 through March 25, 2021. (Minute Entry, Mar. 11, 2021.) The Government respectfully submits that an exclusion of time would serve the ends of justice and outweigh the best interests of the public and the defendants in a speedy trial because it would allow the parties to finalize the expected resolution of this matter through a guilty plea reached pursuant to a plea agreement that has previously been sent to chambers.

Accordingly, the Government respectfully asks that the Court "So Order" this letter to exclude time from March 25, 2021 through and including March 31, 2021 for the reasons explained above.

The Honorable Cathy Seibel United States District Judge

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Respectfully submitted,

AUDREY STRAUSS United States Attorney

bv:

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cc: C. Christian Young, Esq. (Counsel for Erin Verespy)

The time between now and 3/31/21 is hereby excluded under the Speedy Trial Act in the interests of justice. The ends of justice served by the exclusion outweigh the best interests of the public and the defendant in a speedy trial because it will enable Defendant and her counsel to prepare for the plea, and will afford the defendant continuity of counsel, in light of the personal emergency that prevented her counsel from attending at the time previously scheduled for the plea.

SO ORDERED.

CATHY SEIBEL, U.S.D.J

3/19/21